

PLEASE TAKE NOTICE, that Defendant, AGROCORP INTERNATIONAL PTE. LTD. (hereinafter “Agrocorp”), by and through its attorneys, CHALOS, O’CONNOR & DUFFY, LLP, upon the annexed Memorandum of Law dated October 4, 2007, and the Attorney’s Affidavit of Owen F. Duffy in Support dated October 4, 2007, and the pleadings and proceedings heretofore had herein, will move this Court before the Honorable Colleen McMahon at the United States District Court, 500 Pearl Street, New York, New York, at a time and date to be set by the Court upon the completion of the submission of all papers in connection with this motion, for an Order requiring that

Plaintiff PRESTIGIOUS SHIPPING CO. LTD. (hereinafter "Prestigious") post counter-security in this matter in the amount of \$2,302,946.76, and that, that if Plaintiff Prestigious fails to provide such security within ten (10) business days of the date of the Order, that the *Ex-Parte* Process of Maritime Attachment previously ordered in this case be vacated, or, in the alternative, require that Plaintiff Prestigious post counter-security in the same amount of funds belonging to Defendant Agroc corp that it has restrained, and that if Plaintiff Prestigious fails to provide such security within ten (10) business days of the date of the Order, that the *Ex-Parte* Process of Maritime Attachment previously ordered in this case will be vacated or, in the alternative, that this Court grant such other and further relief as the Court may deem just and proper.

Dated: Port Washington, New York
October 4, 2007

CHALOS O'CONNOR & DUFFY
Attorneys for Defendant,
AGROCORP INTERNATIONAL PTE. LTD.

By: 

Owen F. Duffy (OD-3144)
George E. Murray (GM-4172)
366 Main Street
Port Washington, New York 11050
Tel: 516-767-3600
Telefax: 516-767-3605
Email: ofd@codus-law.com

To: Via ECF
Waesche, Scheinbaum & O'Regan, P.C.
Attorneys for the Plaintiff,
PRESTIGIOUS SHIPPING CO. LTD.
111 Broadway, 4th Floor
New York, NY 10006

Attn: John R. Foster, Esq.